

1 Rene L. Valladares  
Federal Public Defender  
2 Nevada State Bar No. 11479  
Erin Gettel  
3 Assistant Federal Public Defender  
Nevada State Bar No. 13877  
4 411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
5 (702) 388-6577  
Erin\_Gettel@fd.org  
6

7 Attorney for Kenneth Moore

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 United States of America,

12 Plaintiff,

13 v.

14 Kenneth Moore and Latoya Jones,

15 Defendants.  
16

Case No. 2:19-mj-00363-VCF

**Stipulation to Continue Preliminary  
Hearing**  
(Fourth Request)

17 The parties jointly request that this Court vacate the preliminary hearing scheduled for  
18 November 15, 2019, and continue it for at least 90 days because:

19 1. The government intends on making an early production of discovery to the  
20 defendants in an effort to reach a pre-indictment plea agreement and lab test results remain  
21 outstanding. The government intends to disclose more discovery as it becomes available, and  
22 defense counsel will need time to review this discovery and discuss it with their clients.

23 2. A pre-indictment plea agreement would obviate the need for either a  
24 preliminary hearing or indictment by a grand jury.

25 3. Defendants are not incarcerated and do not object to a continuance.  
26

1           4.       Denial of this continuance would potentially prejudice the defendants and the  
2 government and would unnecessarily consume this Court's valuable resources.

3           5.       Additionally, denial of this continuance could result in a miscarriage of justice.  
4 The additional time is excludable in computing the time within which the trial must  
5 commence under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), considering the factors  
6 under § 3161(h)(7)(B)(i), (iv).

7           This is the fourth request for continuance.

8           DATED: November 13, 2019.

9           Rene L. Valladares  
10          Federal Public Defender

            Nicholas A. Trutanich  
            United States Attorney

11          /s/ Erin Gettel  
12          By \_\_\_\_\_  
13          Erin Gettel  
            Assistant Federal Public Defender

            /s/ Shaheen Torgoley  
14          By \_\_\_\_\_  
15          Shaheen Torgoley  
            Assistant United States Attorney

16          /s/ Chris T. Rasmussen  
17          By \_\_\_\_\_  
18          Chris T. Rasmussen  
19          Counsel for Latoya Jones  
20  
21  
22  
23  
24  
25  
26

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 United States of America,

4 Plaintiff,

5 v.

6 Kenneth Moore and Latoya Jones,

7 Defendant.

Case No. 2:19-mj-00363-VCF

**Order Granting Fourth Stipulation to  
Continue Preliminary Hearing**

9  
10 Based on the Stipulation of counsel and good cause appearing,  
11 IT IS ORDERED that the preliminary hearing currently scheduled on November 15, 2019,  
12 at 4:00 p.m. is vacated and continued to February 13, 2020 at the hour of 4:00 p.m.

13  
14 DATED this 14th day of November, 2019.

15 

16  
17 UNITED STATES MAGISTRATE JUDGE